

In The United States District Court For The
District of Delaware

Bruce M. Rickards,

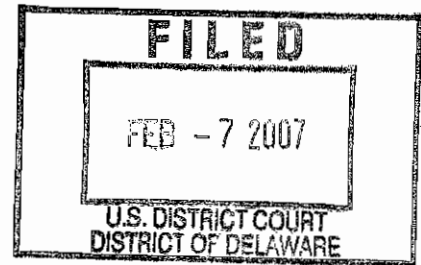
Plaintiff,

C.A. No. 06 - 799 (JJF)

Vs.

EASTERN SHORE CHICKEN FARM
LLC, a limited liability company of the
State of Delaware;

Defendant.



Motion for Motion in Limine

Now here come(s), Duc Ngo, & Tina Ngo Pro se / Eastern
Shore Chicken Farm LLC, moving as "viable - Active", Pendente lite
movant(s); legally impartially moving for a

"Motion in limine" / Motion to "STRIKE"

The very unrealistic, but luminously transparent, totally biased &
unfortunate , farce of the {ASAID} Racist plaintiff's; superficial only
delay - based Vitreous - Transparent - Motion to "R E M A N D", in which
thus; Apparently stealthily - overreaching that near to clandestinely
impermissible,. In which merely indubitably substantiate(s) this motion for
motion for in limine.

Due to on the Record illicit unequivocal, intentional - ethic(s)
multiple violation(s) of their'(s) truly, Mr. Notorious Vel non / "Mr. Bruce
M. Rickards," the so - called, plaintiff, truly in Question,.

As , we legally forward, as at least 3rd Notice the following, fully
constitutional truthful Autoptic, tangible exhibit(s) of factual - fact(s); To
truly directly Substantially , - Substantiate and Re - emphasize as to why
this, viable on the docket constitutional "Motion in limine," should at the
convience of the court "Shall" issue, as a matter of law; Our motion
for a ; Motion in limine shall be "GRANTED" , as a Matter of Law,.
Due to; in the least on the record unlawful Rudimentary crooked - like
{vehement - vexatious} **Unjust - Richment** See defendant'(s)

exhibits; AA , BB

Date Feb-06-07

x Jun gh Ngo
DUC NGO .
P.O. BOX 1374 .
Ocean View, Delaware 19970 .
~~Atlanta~~

Rickards Vs. Eastern Shore Chicken Farm LLC

Exhibit "AA"

{001}. Mr. Bruce M. Rickards, has been calling us {via} telephone, totally in wrongful insidious - deceptive "bad - faith",. Why doesn't his Attorney, of "RECORD, call ? How ever at this point,. We will conclude this statement; If we can get our initial pecuniary down - payment investment back,. We will surely proudly vacate the premise(s) ,. At all deliberate speed,.

{002}. Mr. Bruce M. Rickards did Attempt to sell the initial property, that he could not sell in fact ,. The property, that was illegally listed as being included in the sale of; Property, and equipment Per se

Please Take Notice;

Of Fraud in fact; Please See; {Sussex County - Delaware} Tax Map No. Dist . 533 Map : 5.00 parcel: 0044 this property was included in the initial suspect contractual Agreement, In, which is very unrealistic, And in fact, may or may { NOT }, be "REPORTED, to the "Office of the "ATTORNEY - "GENERAL, of the { 01 st } - State,.

Please Take Lawful Notice

Exhibit "BB" also enclosed

The property listed, as being sold to us {via} unlawful mean(s),
(via), Mr. BRUCE M. RICKARDS, is actually legally Rightfully - lawfully
Owned, Heretofore by;

Mr. Robert W. Wood , and his wife Mrs. Marilyn L. Wood being
the actually owner(s) unequivocally,. "Legally, in fact;

Just based on this fraudulent deception alone; The initial non bona fide
now found to be Heretofore so - called contract shall be 100% void /
voidable under EQUAL Justice Under the Law ,.

And this nuisance suit eventually - " Dismissed,. As a Matter of Law
under the Law,.

Exhibit

BB

Exhibit
BB

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Print Key Output
5722SS1 V5R3M0 040528 S1024618 12/08/06 Page 1
Display Device . . . . . MP
User . . . . . ROD
12/08/06 15:01:35 SUSSEX COUNTY COUNCIL
PR007D Name/Map# Reference-Assess MP
DIST: 533 MAP: 05 . 00 PARCEL: 0044 . 00 UNIT: ROD
WOOD MARILYN L & ROBERT W
TAXABLE ACTIVE
N/RT 92
1300 N/RT 385
W/IMP

16 BITTERSWEET DR
HAGERSTOWN 6714 COUNCILMAN: MR PHILLIPS 16.20 ACRES
TRANSFEE #1S 181726 PREP EXEMPTS :
D/W BOOK & PAGE : 0000 000 DISABILITY :
PROPERTY CODE . . . . . P RESIDENT :
LAND CLASS . . . . . AH LEASE :
SCHOOL DIST . . . . . 1 COMMON ELEM. :
TOWN CODE . . . . . 1 CONDO UNIT :
CAPTATION . . . . . 0 CAPS 0 EXM FIRE.: 76 00 00
PLOT BOOK & PAGE : 000 000 FUND:
APPRAISAL 4,800 (LAND) 2,300 (IMPROVEMENT)
LAST CHANGED 3/20/92 4,100 (RESIDENTIAL APPRAISAL)
F3=EXIT F13=NEW MAP# P1=HELP CODE:
F24=MORE KEYS F12=RETURN F10=POP UPS F2=TAXES P6=PERMITS
    
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Court For The

Exhibit
BB

NO LIEN SEARCH OR TITLE SEARCH WAS DONE AS NONE WAS REQUESTED.

MORRIS, NICHOLS, ARSHY & TUNNELL

BOOK 1048 PAGE 100

ATTORNEYS AT LAW

GEORGETOWN, DELAWARE 19847

This Deed, made this day of February 19 81 by

and between: MARILYN L. WOOD and ROBERT W. WOOD, her husband,
of 4803 Ritchie Highway, Baltimore, Maryland 21225,

parties of the first part,

- AND -

MARILYN L. WOOD and ROBERT W. WOOD, her husband, of 4803
Ritchie Highway, Baltimore, Maryland 21225, as JOINT TENANTS
with right of survivorship, and not as tenants in common,

parties of the second part;

Witnesseth, that the said parties of the first part, for and in
consideration of the sum of ONE DOLLAR (\$1.00)----------, current lawful money of the
United States of America, the receipt whereof is hereby acknow-
ledged, hereby grant and convey unto the said parties of the
second part, their heirs and assigns,ALL that certain piece, parcel or lot of land situated,
lying and being near Roxana, Baltimore Hundred, Sussex
County, Delaware, and being more particularly described as
follows, to wit:

BEGINNING at a monument on the Northerly right-of-way of Sussex County Road #92 and 25 feet distant from the centerline of said road, said monument being a corner for lands of K. Melson; thence by and with the lands of K. Melson along the centerline of a ditch and the centerline extended, North 13 degrees 41 minutes 05 seconds East, 243.05 feet to a point; thence still with lands of K. Melson along the center of the ditch, North 16 degrees 50 minutes 28 seconds East, 390.07 feet to a point; thence on the same course 101.00 feet to a monument, said monument being a corner for lands of Melson and Robert McMullen; thence by and with the lands of McMullen South 73 degrees 37 minutes 31 seconds East 247.17 feet to a point in the centerline of a drainage ditch being a corner for lands of McKinley Tingle; thence by and with the centerline of the ditch and along the lands of Tingle, South 72 degrees 22 minutes 43 seconds East, 1660.59 feet to a point in the centerline of the ditch, said point being a corner for lands of Tingle and Stevens; thence with the lands of Stevens, South 16 degrees 06 minutes 52 seconds West, 792.63 feet to a monument (there being a witness monument on this line at 7.84 feet from the centerline of the ditch); thence still with the lands of Stevens, South 19 degrees 52 minutes 10 seconds West, 332.24 feet to a monument in the Northerly right-of-way of Sussex County Road #92 and 25 feet distant from the centerline of the said road; thence by and with the right-of-way of County Road #92 the following courses and distances: North 67 degrees 34 minutes 57 seconds West, 153.90 feet, North 64 degrees 03 minutes 21 seconds West, 214.59 feet, North 60 degrees 16 minutes 06 seconds West, 1458.79 feet, North 52 degrees 52 minutes 36 seconds West, 106.24 feet to the place of beginning, containing 41.605 acres, more or less, as shown on a survey prepared by Atlantic Engineers, Inc., registered surveyors, dated June 9, 1970, and revised June 19, 1970.

Power of Attorney

SPECIAL POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS, that I

TINA T. NGO

Eastern Shore Chicken Farm

32066 McCary Road

Frankford, Delaware 19945

(302) 436-0175

(571) 224-2488 (cellular)

do hereby make, constitute and appoint

DUC NGO

Eastern Shore Chicken Farm

32066 McCary Road

Frankford, Delaware 19945

(302) 436-0175

(302) 858-6952 (cellular)

my true and lawful attorney for me and in my name, place and stead, and in my behalf, and for my use and benefit to exercise or perform any act, power, duty, right or obligation whatsoever that I now have, or may hereafter acquire the legal right, power, or capacity to exercise or perform, but only to the extent set forth below in this Special Power of Attorney:

To request, ask, demand, sue for, recover, collect, receive, and hold, possess and invest all sums of money, debts, commercial paper, checks, drafts, accounts, deposits, bequests, devises, notes, interests, bonds, dividends, certificates of deposit, any and all documents of title, chooses in action, and demands whatsoever, whether agreed to or disputed, as now are, or shall hereafter become, owned by, or due, owing, payable, or belonging to, me or in which I have or may hereafter acquire any interest, to have, or use; and take all lawful means and equitable and legal remedies, procedures, and writs in my name for the collection and recovery thereof, and to adjust, sell, compromise, and agree for the same; and to make, execute, and deliver for me, on my behalf, and in my name, all endorsements, releases, receipts, or other proper discharges for the same as if done by me personally.

To receive, deposit, hold, invest or cash all payments which I receive from Social Security, Medicare, state or federal income tax refunds, or any other government program or agency, annuities, pension and retirement benefits, insurance benefits and proceeds and to request, ask, demand, sue for and recover same.

To make, receive, sign, endorse, execute, acknowledge, deliver, and possess such applications, contracts, agreements, options, covenants, conveyances, deeds, trust deeds, security agreements, bills of sale, leases, mortgages, assignments, insurance policies, bills

of lading, warehouse receipts, documents of title, bonds, debentures, checks, drafts, bills of exchange, letters of credit, notes, stock certificates, proxies, warrants, commercial paper, receipts, withdrawal receipts and deposit instruments relating to accounts or deposits in, certificates of deposit of, or investments with or through banks, savings and loan brokers, mutual fund companies or other institutions or associations, proofs of loss, evidences of debts, releases, and satisfaction of mortgages, lien, judgments, security agreements and other debts and obligations and such other instruments in writing of whatever kind and nature as may be necessary or proper in the exercise of the rights and powers herein granted.

To enter any safe deposit box, vault or other storage area leased by me alone or in conjunction with any other person, to sign such documents as may be necessary to gain access to same, and to examine, remove and keep the contents of same fully as I could if I were present.

To prepare, or cause to be prepared, federal, state and local tax returns and Internal Revenue Service, state and local powers of attorney; to execute and file federal, state and local tax returns on my behalf and in my name; to respond to notices and audit inquiries and to settle tax disputes.

To carry on any business transaction of any kind of which I am now or hereafter may become interested, including acting in any capacity as I may have as a sole proprietor, partner, shareholder, member, officer or director.

To deal with and elect options under retirement plans including but not limited to annuities, pension plans, profit sharing plans, individual retirement accounts, rollovers, transfer and voluntary contributions of same; to apply for and maintain life insurance; to complete charitable contributions; to make statutory elections and disclaimers; and to settle, pursue, or appeal litigation on my behalf and in my name.

To make, execute, deliver and complete gifts of my property, whether real or personal, tangible or intangible, and without regard to whether such gifts are a part of estate planning or otherwise, and regardless of whether such gifts are a part of a pattern begun by me.

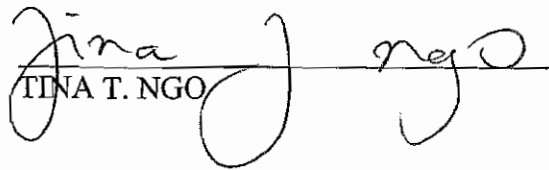
My attorney shall not be compensated for services performed or activities carried out on my behalf pursuant to this Special Power of Attorney.

I grant to said attorney full power and authority to do, take, and perform, all and every act and thing whatsoever requisite, proper, or necessary to be done, in the exercise of any of the rights and powers herein granted, as fully for all intents and purposes as I might or could do if personally present, with full power of substitution or revocation, hereby ratifying and confirming all that said attorney, or his substitute or substitutes, shall lawfully do or cause to be done by virtue of this power of attorney and the rights and powers herein granted.

No person shall be required to inquire as to the circumstances of the issuance or use of this instrument or as to the disposition of any proceeds paid to my attorney based on this instrument.

If this Special Power of Attorney is terminated by operation of law, any person acting in reliance upon it without notice of such termination shall be held harmless.

IN WITNESS WHEREOF, TINA T. NGO has executed this Special Power of Attorney on December 11, 2006 at 6478 Lindale Rd A6r VA 22312


TINA T. NGO

Acknowledgment

State of Virginia)
County of Fairfax) ss

On this December 11, 2006, before me personally appeared TINA T. NGO, to me known to be the person described in and who executed the foregoing instrument and acknowledged to me that TINA T. NGO executed the same as his free act and deed.


Notary Public

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

Mr. Bruce M. Rickards

Plaintiff,

v.

Eastern Shore Chicken Farm LLC.,
A limited liability company of the
State of Delaware;

Defendant.

C.A. No.: 06 - 799

AFFIDAVIT OF Due Ngo and Tina Ngo

DISTRICT COURT
~~UNITED STATES COURT OF APPEALS~~ :
District of Delaware : SS.
~~THE THIRD CIRCUIT~~

The, preceding – indelible truthful – statement(s), in the “ Motion in Limine ” are
true to the best of my knowledge and belief(s); of; Due Ngo and Tina Ngo and are in full
vehement compliance / Compliance(s), Here-with,/ Here – under; 28 U.S.C.A. Section 1746.

Due Ngo

Due Ngo

Feb-06-07

Date

Tina Ngo Power of attorney for Tina Ngo

Tina Ngo

Feb-06-07

Date

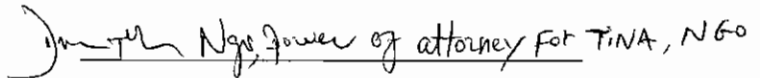
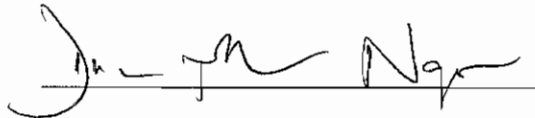
CERTIFICATE OF SERVICE

I hereby certify that two true copies of the "Motion in Limine" have been certified mailed this 6 day of February 2007, to the following addresses:

United States District of Delaware
Bogg'(s) Federal Bldg.,
844 N. King Street
Lockbox 18
Wilmington, DE 19801 - 3517
✓ **Certified Mail** - 7005 3110 0000 5101 7174
~~7771~~

Eric C. Howard, Esquire
Wilson, Halbrook & Bayard, P.A.
107 West Market Street
P.O. Box 690
Georgetown, DE 19947
Certified Mail - 7005 3110 0000 1602 **7771**

and that counsel and the United States District Court of Delaware has received these two copies by Duc Ngo and Tina Ngo



Tina Ngo, power of attorney for TINA, NGo